

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:22-cv-68-BO

YOLANDA IRVING, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	AFFIDAVIT OF
	)	MICHELLE LIGUORI
	)	IN SUPPORT OF
THE CITY OF RALEIGH, et al.,	)	SEU DEFENDANTS’
	)	BILL OF COSTS
Defendants.	)	
_____	)	

Michelle A. Liguori, being first duly sworn, deposes and states as follows:

1. I am over twenty-one years of age and competent to testify in all other respects. I have personal knowledge of the matters set forth below. If called upon to testify about these facts, I could and would do so.

2. I am a partner with the law firm of Ellis & Winters LLP. I, along with Leslie C. Packer and my law firm, represent Defendant Officers David Mead, Jesus Ortiz, Kyle Perrin, Michael Mollere, Kyle Thompson, Vincent Debonis, Daniel Twiddy, Thomas Webb, David McDonald, and David Garner, who are members of the Raleigh Police Department’s Selective Enforcement Unit (collectively, the “SEU Defendants”), in the above-captioned action.

3. I have reviewed the billing records and the invoices for costs and expenses paid on behalf of the SEU Defendants in the defense of this action. I have verified that the SEU Defendants incurred \$10,828.49 of costs for fees for obtaining

electronically stored transcripts, obtaining medical records, serving a subpoena, and docketing their Motion to Dismiss. Based on how these depositions were noticed, how these materials were used in the litigation of this matter, and my review of the precedent cited in the Memorandum of Law in support of the Bill of Costs being filed contemporaneously herewith, I believe that these fees were necessarily obtained for use in this case/litigation, as that term has been interpreted.

4. The SEU Defendants thus incurred taxable costs totaling \$10,828.49 in defense of this case. An itemization of these expenses is attached collectively as “Exhibit A” to the Bill of Costs that is being filed contemporaneously herewith. True and accurate copies of the invoices for these expenses are attached collectively as “Exhibit B.”

5. Each of these costs was reasonable and necessary to prepare for trial and to defend against Plaintiffs’ claims asserted against the SEU Officer Defendants.

Further this affiant sayeth not.

This the 27th day of March, 2023.

Michelle A. Liguori

Michelle A. Liguori

Sworn to and subscribed before me,  
this 27 day of March, 2023.

Andrea M. Williams

Notary Public

Andrea M. Williams

Printed Name

My commission expires: 10-19-2026



CERTIFICATE OF SERVICE

I hereby certify that on 27 March 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Michelle A. Liguori  
Michelle A. Liguori